



January 11, 2021

Dear ICC Board of Directors:

Please consider this letter as a formal statement of opposition to any consideration to update the International Energy conservation Code (IECC) and Ch. 11 of the International Residential Code by using the ICC standards process.

As Building Officials operating in a political environment, the integrity of the code development process, is one of the tools used against political pressure for favoritism. By educating the governing bodies on the inclusive nature of the code development process, we are able to help stem the pressure from special interest groups. If the IECC does not follow the normal code development process, ICC is removing a critical tool from the hands of the building officials.

Although it is acknowledged that the Code adoption process may be considered slow and too cumbersome to stay current with the developing technologies in energy conservation, the same could be true of other areas governed by the Codes, such as life safety systems and the cannabis industry. If the code adoption process is appropriate for the life safety codes, why is it not adequate for the IECC?

If the Board elects to proceed with the new development process for the IECC, we strongly object to ICC continuing to reference the IECC as a "Code". Since the document did not follow the code development process, it is misleading to the public and the building officials to reference it as a code.

Thank you for your careful consideration of our objection to modifying the International Energy Conservation Code Development Process.

Kevin T. McOsker, P.E., CBO
Chair – Southern Nevada Building Officials.

Southern Nevada Building
Officials

c/o City of Las Vegas
Building & Safety
333 N. Rancho Drive
Las Vegas, NV 89106

Phone: 702-229-4883

Email:

[kmcosker@LasVegasNevada
.GOV](mailto:kmcosker@LasVegasNevada.GOV)

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